

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

A.O.A., <i>et al.</i> ,)	
)	
Plaintiffs,)	Case No. 4:11-cv-00044-CDP
)	(CONSOLIDATED)
vs.)	
)	
THE DOE RUN RESOURCES)	
CORPORATION, <i>et al.</i> ,)	
)	
Defendants.)	

JOINT STATUS REPORT

Pursuant to the Court's Third Amended Case Management Order [Doc. 1043], the parties submit the following joint report for the Court's consideration. The parties continue to work to comply with previously-set discovery deadlines. Each party will be prepared to update the Court on its respective progress during the upcoming status conference. Further, the parties wish to inform the Court of the following:

1) Status of Sheyla Angela Condor Ortega. As reported in the Parties' Joint Motion to Modify Second Amended Case Management Order 15 [Doc. 1042], Plaintiffs have represented that Final Trial Pool Plaintiff Sheyla Angela Condor Ortega was not available to attend her Rule 35 examination during the timeframe recently set, nor will she be available to travel to the United States in the near future. The parties disagree on the appropriate remedy for Ms. Condor Ortega's inability to appear. Following conferral with Plaintiffs, Defendants intend to submit a formal motion for appropriate relief in lieu of addressing the issues herein. Plaintiffs will respond to any such motion in the timeframe permitted by the Federal Rules, or as the Court may deem appropriate.

2) Discovery to Majority Age Plaintiffs. Defendants will seek leave to serve limited written discovery from all majority age Plaintiffs to clarify the number of litigants actually pursuing

claims against Defendants and obtain updated information ahead of the upcoming ADR referral period. Plaintiffs will oppose this request. Defendants intend to submit a formal motion for relief in lieu of addressing the issues in this joint status report. Plaintiffs will respond to any such motion in the timeframe permitted by the Federal Rules, or as the Court may deem appropriate.

Dated: October 23, 2019

Respectfully submitted,

**SCHLICHTER, BOGARD & DENTON,
LLP**

By: /s/ Elizabeth M. Wilkins

Jerome J. Schlichter, #32225
Roger C. Denton, #30292
Kristine K. Kraft, #37971
Nelson G. Wolff, #40796
Elizabeth M. Wilkins, #61284
100 South 4th Street., Suite 1200
St. Louis, Missouri 63102
Telephone: (314) 621-6115
jshlichter@uselaws.com
rdenton@uselaws.com
kkraft@uselaws.com
nwolff@uselaws.com
bwilkins@uselaws.com

Attorneys for Plaintiffs

KING & SPALDING LLP

By: /s/ Geoffrey M. Drake

Tracie J. Renfroe, #16777000T
trenfroe@kslaw.com
Carol M. Wood, #2594581
cwood@kslaw.com
1100 Louisiana Street
Suite 4000
Houston, Texas 77002
Telephone: (713) 751-3200
Facsimile: (713) 751-3290

Andrew T. Bayman, #043342GA
abayman@kslaw.com
Carmen R. Toledo, #714096GA
ctoledo@kslaw.com
Geoffrey M. Drake, #229229GA
gdrake@kslaw.com
1180 Peachtree Street, N.E.
Suite 1600
Atlanta, Georgia 30309
Telephone: (404) 572-4600
Facsimile: (404) 572-5100

James P. Cusick, #4041653NY
jcusick@kslaw.com
1185 Avenue of the Americas, 34th Floor
New York, New York 10036
Telephone: (212) 556-2170
Facsimile: (212) 556-2222

*Attorneys for Defendants The Renco Group, Inc.,
D.R. Acquisition Corp., Doe Run Cayman Holdings,
LLC, Ira L. Rennert, The Doe Run Resources
Corporation, Theodore P. Fox, III, Marvin K.
Kaiser, Albert Bruce Neil, Jeffrey L. Zelms*

LEWIS RICE LLC

Andrew Rothschild, #23145MO
arothschild@lewisrice.com
Thomas P. Berra, Jr., #43399MO
tberra@lewisrice.com
Michael J. Hickey, #47136MO
mhickey@lewisrice.com
600 Washington Ave., Suite 2500
St. Louis, MO 63102-2147
Telephone: (314) 444-7600
Facsimile: (314) 241-6056

*Attorneys for Defendants The Doe Run
Resources Corporation, Marvin K. Kaiser,
Albert Bruce Neil, Jeffrey L. Zelms, and
Theodore P. Fox, III*

DOWD BENNETT LLP

Edward L. Dowd, Jr. #28785MO
edowd@dowdbennett.com
Jeffrey R. Hoops, #69813MO
jhoops@dowdbennett.com
7733 Forsyth Blvd., Suite 1900
St. Louis, Missouri 63105
Telephone: (314) 889-7300
Facsimile: (314) 863-2111

*Attorneys for Defendants The Renco Group, Inc.,
D.R. Acquisition Corp., Ira L. Rennert, and Doe
Run Cayman Holdings, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 23rd day of October, 2019, a true and correct copy of the foregoing was filed with the Clerk of the Court through the Court's CM/ECF system, which will effect service on all counsel of record by sending a Notice of Electronic Filing.

/s/ Elizabeth M. Wilkins